

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DENNIS RAMOS, ED RODRIGUEZ, and EDWARD
KRALICK, individually and on behalf of all other
persons similarly situated who were employed by
TELGIAN CORPORATION and any other entities
affiliated with, controlling, or controlled by TELGIAN
CORPORATION,

Plaintiffs,

- against -

TELGIAN CORPORATION and any other entities
affiliated with, controlling, or controlled by TELGIAN
CORPORATION,

Defendant.

Docket No.: 14-cv-03422-PKC-LB

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Plaintiffs' Memorandum of Law in Support of Its Motion for Interlocutory Appeal and Stay of this Action, the undersigned will respectfully move this Court on a date and time to be set by the Court, before the Honorable Pamela K. Chen, at the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order granting (1) certification of immediate interlocutory appeal of the Court's March 31, 2016 Order, (2) a stay of this action pending the Second Circuit's determination on the appeal, and (3) such other and further relief as the Court deems just and proper.

Dated: New York, New York
April 14, 2016

VIRGINIA & AMBINDER, LLP

By: /s/
Lloyd Ambinder, Esq.
James Murphy, Esq.
Jack L. Newhouse, Esq.
40 Broad Street, 7th Floor
New York, New York 10004

Tel: (212) 943-9080

Fax: (212) 943-9082

Attorneys for Plaintiffs and Putative Collective

To: Brian Gergengorn, Esq.
Aaron Warshaw, Esq.
OGLETREE, DEAKINS, NASH
SMOAK, & STEWART, P.C.
1745 Broadway, 22nd Floor
New York, New York 10019
Attorneys for Defendant
Telgian Corporation